



PP-IL-001-009

**VALKYRIE CITATIONS AND WARNINGS
FOR SPEEDING OFFENSES AT PARTICULAR SPEEDS
AS A PERCENTAGE OF SPEEDING OFFENSES AT ALL SPEEDS,
COMPARING MOTORISTS WITH HISPANIC SURNAMES
TO MOTORISTS WITHOUT HISPANIC SURNAMES**

POSTED SPEED	CLOCKED SPEED	DISTRICT 4		DISTRICT 5		DISTRICT 6		DISTRICT 7		DISTRICT 9		DISTRICT 10	
		H	n-H	H	n-H	H	n-H	H	n-H	H	n-H	H	n-H
55	56-60	23.83%	25.14%	32.03%	31.64%	64.00%	53.88%	24.85%	21.17%	21.78%	15.28%	62.37%	61.84%
	61-65	42.98%	32.81%	29.00%	29.10%	19.20%	14.64%	51.97%	56.24%	67.04%	55.56%	16.83%	13.56%
65	66-70	14.29%	38.98%	35.05%	34.00%	57.50%	39.69%	31.78%	27.42%	24.05%	11.98%	59.71%	48.67%
	71-75	57.14%	25.42%	18.69%	20.60%	4.16%	9.05%	33.77%	32.43%	39.24%	37.33%	14.21%	7.68%

POSTED SPEED	CLOCKED SPEED	DISTRICT 11		DISTRICT 12		DISTRICT 13		DISTRICT 17		DISTRICT 18	
		H	n-H	H	n-H	H	n-H	H	n-H	H	n-H
55	56-60	51.56%	50.82%	23.91%	8.55%	22.83%	16.05%	24.06%	31.33%	7.84%	2.99%
	61-65	40.84%	16.13%	63.04%	73.28%	55.11%	53.07%	62.57%	49.81%	62.74%	70.41%
65	66-70	67.50%	46.91%	42.14%	19.45%	25.20%	10.86%	38.09%	33.21%	14.63%	8.93%
	71-75	19.16%	13.95%	43.89%	45.75%	66.48%	53.24%	45.50%	32.65%	43.90%	47.26%

KEY: "H" = Motorists with Hispanic surnames, per the method described on page 4 of the Report by Dr. Shapiro.
"n-H" = Motorists without Hispanic surnames, per the same method.

NOTE: This data addresses citations and warnings issued from 1990 to 1997 by officers who have served on a Valkyrie team.

The attached "worksheets" explain the derivation of these figures from Exhibit 6 of the Report of Dr. Shapiro.

**46 Valkyrie Officers Target Hispanic Motorists
When They Stop Vehicles With One Or More Categories of State Plates,
Based on Defendants' Own Benchmarks***

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ISP District	Officer ID Number	Officer Name	Six Drug Source States (21.98% Hispanic)			Non-Drug Source States (6.02% Hispanic)			Texas (25.55% Hispanic)		
			Number Stops	Percent Hispanic	Standard Deviations	Number Stops	Percent Hispanic	Standard Deviations	Number Stops	Percent Hispanic	Standard Deviations
4	3254	[REDACTED]	106	31%	2.24	613	8%	2.08	60	40%	2.57
4	3285	[REDACTED]	1			1103	11%	6.98	93	37%	2.53
4	3689	[REDACTED]				455	10%	3.59			
4	3729	[REDACTED]	57	33%	2.01				37	43%	2.43
4	3838	[REDACTED]	130	35%	3.59				84	46%	4.3
4	4174	[REDACTED]							22	50%	2.63
5	1818	[REDACTED]				883	9%	3.75			
6	3858	[REDACTED]				717	13%	7.88			
6	3927	[REDACTED]	598	35%	7.69	1312	15%	13.71	322	48%	9.24
6	3973	[REDACTED]	135	34%	3.37				77	52%	5.32
7	3799	[REDACTED]				1483	9%	4.86			
9	3934	[REDACTED]	93	35%	3.03	560	9%	2.98	58	38%	2.17
9	3969	[REDACTED]				752	11%	5.76	28	46%	2.48
9	4021	[REDACTED]				320	11%	3.76			
9	4034	[REDACTED]				941	12%	7.74			
9	4051	[REDACTED]	203	28%	2.07	1337	9%	4.61	133	38%	3.29
9	4337	[REDACTED]	206	34%	4.17	588	14%	8.16	120	47%	5.39
9	4340	[REDACTED]				483	9%	2.77			
9	4347	[REDACTED]							46	41%	2.4
10	3590	[REDACTED]	91	32%	2.31				59	44%	3.25
10	3604	[REDACTED]							108	41%	3.68

* This chart is based on citations and warnings issued by Valkyrie officers on the interstate highways and during the day (i.e., from 5 a.m. to 8 p.m.), and compares (a) the rate at which individual Valkyrie officers issue citations and warnings to Hispanic motorists, with (b) Dr. Donohue's benchmarks for these categories of motorists (which are based on the 1990 Census).

**46 Valkyrie Officers Target Hispanic Motorists
When They Stop Vehicles With One Or More Categories of State Plates,
Based on Defendants' Own Benchmarks**

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ISP District	Officer ID Number	Officer Name	Six Drug Source States (21.98% Hispanic)			Non-Drug Source States (6.02% Hispanic)			Texas (25.55% Hispanic)		
			Number Stops	Percent Hispanic	Standard Deviations	Number Stops	Percent Hispanic	Standard Deviations	Number Stops	Percent Hispanic	Standard Deviations
11	3565	[REDACTED]				588	8%	2.04			
11	4168	[REDACTED]	472	28%	3.16	1069	15%	12.37	166	41%	4.56
11	4375	[REDACTED]	331	31%	3.96	980	13%	9.21	146	46%	5.67
11	4398	[REDACTED]				295	12%	4.33			
11	4435	[REDACTED]				417	9%	2.58			
11	4634	[REDACTED]				90	12%	2.39			
12	3039	[REDACTED]				133	12%	2.91			
12	3235	[REDACTED]				770	8%	2.33	69	41%	2.94
12	3772	[REDACTED]	279	29%	2.83	705	11%	5.58	157	41%	4.44
12	3822	[REDACTED]				1180	8%	2.89	85	35%	2
12	3828	[REDACTED]	423	36%	6.96	994	15%	11.93	275	48%	8.54
12	3976	[REDACTED]	171	31%	2.85	596	12%	6.16	123	39%	3.42
12	4127	[REDACTED]	794	26%	2.74	2250	13%	13.96	443	39%	6.49
13	1924	[REDACTED]	83	41%	4.18	253	18%	8.02	65	48%	4.15
13	3714	[REDACTED]				488	10%	3.71			
13	3789	[REDACTED]	93	52%	6.99	159	28%	11.66	74	57%	6.2
13	3860	[REDACTED]	284	29%	2.86	1297	10%	6.06	181	40%	4.46
13	3872	[REDACTED]	128	55%	9.02	235	26%	12.89	101	64%	8.86
13	3936	[REDACTED]	287	30%	3.28	1000	14%	10.64	212	38%	4.16
13	4026	[REDACTED]	197	54%	10.85	376	26%	16.3	148	66%	11.28
13	4184	[REDACTED]	126	32%	2.72	323	10%	3.02	82	41%	3.21
13	4294	[REDACTED]	154	42%	6	299	23%	12.36	123	46%	5.2
17	3589	[REDACTED]				2131	10%	7.76			
17	3967	[REDACTED]									
17	3987	[REDACTED]	833	26%	2.8	1035	13%	9.47	152	40%	4.08